

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	CC Docket No. 96-45
Federal-State Joint Board on)	
Universal Service)	
Petition for Reconsideration or Alternatively.)	
Waiver of the Commonwealth of the Northern)	
Mariana Islands)	

**COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) hereby submits these comments on the Petition for Reconsideration, or Alternatively, Waiver filed by the Commonwealth of the Northern Mariana Islands (Commonwealth) on September 11, 1998. As the principal trade association of the local exchange carrier industry, USTA comprises approximately 1,200 carrier members.

In its Petition, the Commonwealth indicated that the Commission should reconsider portions of its *Fifth Order on Reconsideration and Fourth Report and Order in CC Docket No. 96-45*,¹ (*Fifth Report*) or alternatively waive the 75 day filing window deadline to permit the Commonwealth's schools and libraries to receive funding for supported services. The Commission should reject the petition for reconsideration.

¹FCC 98-120 (released June 22, 1998).

The Commission acted appropriately and in the public interest in the *Fifth Order*.

The adoption of the 75 day window was fair and just and allowed ample opportunity for all applicants to have their completed applications received by the Schools and Libraries Corporation considered as if they were received simultaneously.

The promulgation of the Commission's rules regarding Universal Service and the *Fifth Order* should not be abrogated. There was adequate notice and opportunity for interested parties to develop the record for the Commission's *Fifth Order*.

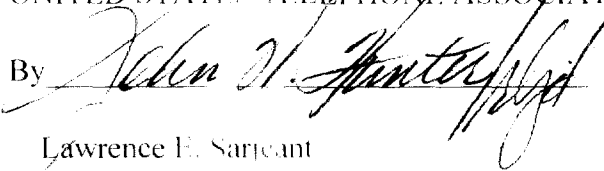
The Universal Service Schools and Libraries program is on-going and allows schools and libraries to receive funding at any time within the funding year providing they meet certain criteria. This criterion includes submitting an application within a specified period.

The Commonwealth has not shown adequate reason to justify either reconsideration of the 75 day filing window or waiver of that requirement. Therefore, USTA urges the Commission to deny the petition filed by the Commonwealth.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By



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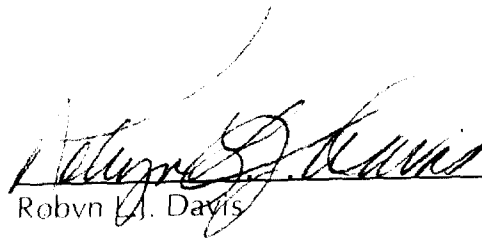
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October 13, 1998

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on October 13, 1998 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Robyn L.J. Davis

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